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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 REBECCA MARTIN, an Individual;

10 Plaintiff,

11 v.

12 TARGET CORPORATION, a Foreign Corporation;
13 YET UNKNOWN EMPLOYEE; DOES I through
X, inclusive,

14 Defendants.

CASE NO.: 2:17-cv-02329-APG-NJK

**STIPULATION FOR EXTENSION OF
DISCOVERY DEADLINES (First Request)**

15 The above named parties, by and through their respective counsel of record, hereby submit
16 the following STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES (First Request).

17 **A. DISCOVERY COMPLETED TO DATE**

18 This matter involves a slip and fall at one of defendant's stores. On October 10, 2017, the
19 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and
20 documents on October 12, 2017. Plaintiff served her initial disclosure of witnesses and documents
21 on October 10, 2017. On October 17, 2017, the Court entered a Stipulated Discovery
22 Plan/Scheduling Order.

23 On October 17, 2017, defendant propounded a First Set of Interrogatories and First Set of
24 Requests for Production of Documents upon plaintiff. Plaintiff served her responses to the
25 Interrogatories on November 20, 2017 and responses to the Requests for Production of Documents
26 on November 28, 2017. On October 30, 2017, plaintiff propounded a First Set of Requests for
27 Production of Documents upon defendant. Plaintiff has granted defendant an extension to respond
28 to those written discovery requests. On November 22, 2017, plaintiff propounded a Second Set of

1 Requests for Production of Documents upon defendant.

2 On November 22, 2017, plaintiff noticed the deposition of one of defendant's current
3 employees and the deposition of one of defendant's former employees for February 6, 2018.

4 Defendant has requested plaintiff's medical records and films directly from her medical
5 providers through records authorizations provided by plaintiff.

6 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

7 Defendant is still obtaining plaintiff's medical records through authorizations provided by
8 plaintiff. Defendant needs to conduct the deposition of plaintiff and possibly four of plaintiff's
9 treating healthcare providers once defendant has received plaintiff's medical records directly from
10 the providers. Additionally, plaintiff suffered a prior injury at work, and defendant may seek to
11 depose any healthcare providers who provided treatment for that injury once defendant obtains the
12 medical records regarding that treatment. Plaintiff continues to experience symptoms she attributes
13 to the subject incident so defendant may seek to have plaintiff appear for a Rule 35 Examination.
14 Defendant needs to respond to plaintiff's written discovery requests.

15 Plaintiff has scheduled the deposition of one of defendant's former and one of defendant's
16 current employees and may conduct the depositions of additional employees and representatives.
17 The parties also anticipate designating expert witnesses and conducting the depositions of any
18 designated expert witnesses.

19 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

20 Defendant is still in the process of obtaining plaintiff's medical records and films. Defendant
21 needs to obtain those records before conducting the depositions of plaintiff and her prior and current
22 treating healthcare providers. Defendant also needs to obtain those records and films to provide to
23 defendant's medical expert. Also, plaintiff continues to experience symptoms she attributes to the
24 subject incident, and defendant may seek to have her appear for a Rule 35 Examination. All of this
25 discovery cannot be completed and provided to expert witnesses to allow them to complete expert
26 reports prior to the current initial expert disclosure deadline. Accordingly, the parties request a sixty
day extension of the current discovery deadlines.

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D. PROPOSED DISCOVERY SCHEDULE

Close of Discovery:	May 4, 2018
Dispositive Motions:	June 4, 2018
Joint Pre-Trial Order:	July 5, 2018
Last day to amend pleadings:	Closed
Initial Expert Disclosures:	March 5, 2018
Rebuttal Expert Disclosures:	April 4, 2018
Interim Status Report	March 5, 2018

DATED this __ day of December, 2017. DATED this __ day of December, 2017.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP** **THE GALLIHER LAW FIRM**

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<i>Attorneys for defendant Target Corporation</i>	

IT IS SO ORDERED.

Dated December 20, _____, 2017.


UNITED STATES MAGISTRATE JUDGE